1 Rene L. Valladares Federal Public Defender 2 Nevada State Bar No. 11479 *Jeremy C. Baron 3 Assistant Federal Public Defender 4 District of Columbia Bar No. 1021801 411 E. Bonneville Ave. Suite 250 5 Las Vegas, Nevada 89101 (702) 388-6577 6 jeremy baron@fd.org 7 *Attorney for Petitioner William Crawford, Jr. 8 9 10 United States District Court DISTRICT OF NEVADA 11 William Crawford, Jr., 12 Case No. 2:19-cv-01574-RFB-BNW 13 Petitioner, Unopposed motion for extension of 14 v. time to file opposition to the State's motion to dismiss Jerry Howell, et al., 15 16 Respondents. (First request) 17 18 William Crawford respectfully moves this Court for an extension of time of 19 forty-five (45) days, from July 26, 2021, to and including September 9, 2021, in which 20 to file an opposition to the State's motion to dismiss. 21 22 23 24 25 26 27

ARGUMENT

The State has moved to dismiss Mr. Crawford's second amended petition. ECF No. 23. The opposition to the motion to dismiss is currently due July 26, 2021.

Counsel respectfully suggests an extension is necessary to properly prepare the opposition. In addition to preparing the opposition, counsel also anticipates preparing and filing a contemporaneous discovery motion regarding Ground Two. See ECF No. 15 at 3 (scheduling order). The process of drafting the discovery motion (and determining what specific categories of discovery to request) will require additional time. Likewise, the process of finalizing and filing both the opposition and the discovery motion requires additional time.

Counsel has had many additional professional obligations in the past couple months, including, among others, an opening memorandum in support of an appeal from a detention decision filed on June 7, 2021, along with a reply memorandum filed on June 24, 2021, in *United States v. DeGrave*, Case No. 21-3030 (D.C. Cir.); an evidentiary hearing conducted on June 11, 2021, along with an opposition to a motion to stay the judgment pending appeal filed on July 26, 2021, in *Bradford v. Gittere*, Case No. 2:13-cv-01784-RFB-EJY (D. Nev.); an opposition to a motion to dismiss filed on June 28, 2021, in *Rosales v. Neven*, Case No. 3:16-cv-00003-RCJ-WGC (D. Nev.); a motion to stay, along with a proposed second amended petition, filed on June 29, 2021, in *Bynoe v. Helling*, Case No. 3:07-cv-00009-LRH-CLB (D. Nev.); a petition for rehearing filed on July 6, 2021, in *Cortinas v. Gentry*, Case No. 20-16227 (9th Cir.); a second amended petition filed on July 14, 2021, in *Thomas v. Williams*, Case No. 2:18-cv-00020-GMN-PAL (D. Nev.); and an opening brief filed on July 21, 2021, in *Slaughter v. Daniels*, Case No. 82602 (Nev. Sup. Ct.).

Counsel has many additional professional obligations in the next two months, including, among others, a second amended petition due on August 2, 2021, in *Patterson v. Williams*, Case No. 2:20-cv-01267-GMN-NJK (D. Nev.); an answering brief

due on August 4, 2021, in Murray v. Howell, Case No. 21-15104 (9th Cir.); an opposition to a motion to dismiss due on August 12, 2021, in Fergason v. Johnson, Case No. 2:19-cv-00946-GMN-BNW (D. Nev.); an opposition to a motion to dismiss due on August 26, 2021, in Hobson v. Hutchings, Case No. 2:20-cv-00503-KJD-NJK (D. Nev.); a second amended petition due on August 30, 2021, in Palmer v. Gittere, Case No. 3:18cv-00245-HDM-CLB (D. Nev.); and an oral argument scheduled for September 3, 2021, in San Francisco, California, in Patterson v. Hutchings, Case No. 20-15635 (9th Cir.).

On July 23, 2021, counsel contacted Deputy Attorney General Sheryl Serreze and informed her of this extension request. As a matter of professional courtesy, Ms. Serreze had no objection to the request. Ms. Serreze's lack of objection shouldn't be considered a waiver of any procedural defenses or statute of limitations challenges or construed as agreeing with the accuracy of the representations in this motion.

In sum, counsel requests an additional forty-five (45) days, up to and including September 9, 2021, in which to file the opposition. This is counsel's first request for an extension of time to file the opposition. This motion isn't filed for the purposes of delay, but in the interests of justice, as well as in Mr. Crawford's interest. Counsel respectfully asks the Court to grant the requested extension.

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Respectfully submitted,

Rene L. Valladares Federal Public Defender

/s/Jeremy C. Baron

Jeremy C. Baron

Assistant Federal Public Defender

IT IS SO ORDERED:

RICHARD F BOOLWARE, II
United States District Court
DATED this 27th day of July, 2021.